

WILLIAM M. SMITH AND OLIVIA G.	:	NO. <u>19083</u>	EQUITY
SMITH, HIS WIFE	:		
1413 Forrest Park Avenue	:	IN THE CIRCUIT COURT FOR	
Baltimore, Maryland	:		
COMPLAINANTS	:	FREDERICK COUNTY, IN EQUITY.	
VS.	:		
ROY H. SORRELLS AND DOROTHY F.	:		
SORRELLS, HIS WIFE	:		
Thurmont, Maryland	:		
RAY P. BOGGS AND ZADA R. BOGGS,	:		
HIS WIFE, address unknown	:		
DEFENDANTS	:		

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TO THE HONORABLE, THE JUDGES OF SAID COURT:

The Bill of Complaint of William M. Smith and Olivia G. Smith, his wife, by W. Jerome Offutt, their Solicitor, respectfully shows unto your Honors:

FIRST: That on or about the 13th day of August, 1958, the Defendants, Roy H. Sorrells and Dorothy F. Sorrells, his wife, of Frederick County, Maryland, being seized and possessed of a tract or parcel of land located along the Public Road leading from Emmitsburg to Thurmont, known as the Old Mechanicstown Road, about four miles from Emmitsburg, in Thurmont District, Frederick County, Maryland, containing 11 acres and 36 square perches, more or less, agreed with your Complainants in writing to sell unto them the aforesaid real estate for the sum of Six Thousand Eight Hundred (\$6,800.00) Dollars, whereof the sum of Five Hundred (\$500.00) Dollars was paid at the execution of the Agreement and the residue thereof to be paid on the delivery of the Deed, which said Deed was to have been delivered on or before the 15th day of September, 1958; and your Complainants file herewith, as part hereof, the said Agreement in writing, signed and sealed by the said Roy H. Sorrells and Dorothy F. Sorrells, his wife, and your Complainants, marked "Complainants' Exhibit A."

SECOND: That your Complainants have performed all the requirements of said Agreement on their part to be performed, but the said Roy H. Sorrells and Dorothy F. Sorrells refuse to make a conveyance of the said property to your Complainants, as they rightfully and by the terms of the Contract should so convey to your Complainants.

THIRD: That the real estate aforesaid was conveyed to Roy H. Sorrells and Dorothy F. Sorrells, his wife, by Chesapeake Conference Association of Seventh-Day Adventists, a Corporation of the State of Delaware, by a Deed dated the 12th day of April, 1949, and recorded in Liber 479, folio 581 etc., one of the